

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FRONTPOINT ASIAN EVENT DRIVEN FUND, L.P.,
and SONTERRA CAPITAL MASTER FUND, LTD., on
behalf of themselves and all others similarly situated,

Plaintiffs,

- against -

CITIBANK, N.A., CITIGROUP INC., BANK OF
AMERICA CORPORATION, BANK OF AMERICA,
N.A., JPMORGAN CHASE & CO., JPMORGAN
CHASE BANK, N.A., THE ROYAL BANK OF
SCOTLAND PLC, THE ROYAL BANK OF
SCOTLAND GROUP PLC, RBS SECURITIES JAPAN
LIMITED, UBS AG, UBS SECURITIES JAPAN CO.
LTD., ING GROEP N.V., ING BANK N.V., ING
CAPITAL MARKETS LLC, BNP PARIBAS, S.A.,
BNP PARIBAS NORTH AMERICA, INC., BNP
PARIBAS SECURITIES CORP., BNP PARIBAS
PRIME BROKERAGE, INC., OVERSEA-CHINESE
BANKING CORPORATION LTD., BARCLAYS PLC,
BARCLAYS BANK PLC, BARCLAYS CAPITAL
INC., DEUTSCHE BANK AG, CREDIT AGRICOLE
CORPORATE AND INVESTMENT BANK, CREDIT
AGRICOLE S.A., CREDIT SUISSE GROUP AG,
CREDIT SUISSE AG, CREDIT SUISSE
INTERNATIONAL, STANDARD CHARTERED
BANK, STANDARD CHARTERED PLC, DBS BANK
LTD., DBS GROUP HOLDINGS LTD, DBS VICKERS
SECURITIES (USA) INC., UNITED OVERSEAS
BANK LIMITED, UOB GLOBAL CAPITAL, LLC,
AUSTRALIA AND NEW ZEALAND BANKING
GROUP, LTD., ANZ SECURITIES, INC., THE BANK
OF TOKYO-MITSUBISHI UFJ, LTD., THE
HONGKONG AND SHANGHAI BANKING
CORPORATION LIMITED, HSBC BANK USA, N.A.,
HSBC HOLDINGS PLC, HSBC NORTH AMERICA
HOLDINGS INC., HSBC USA INC., MACQUARIE
BANK LTD., MACQUARIE GROUP LTD.,
COMMERZBANK AG, AND JOHN DOES NOS. 1-50,

Defendants.

Docket No. 16-cv-05263-AKH

**NOTICE OF DEFENDANTS'
MOTIONS TO DISMISS THE
CORRECTED SECOND
AMENDED CLASS
ACTION COMPLAINT**

**ORAL ARGUMENT
REQUESTED**

PLEASE TAKE NOTICE that the undersigned, attorneys for Defendants Citibank, N.A., Citigroup Inc., Bank of America Corporation, Bank of America, N.A., JPMorgan Chase & Co., JPMorgan Chase Bank, N.A., The Royal Bank of Scotland plc, The Royal Bank of Scotland Group, plc, RBS Securities Japan Limited, UBS AG, UBS Securities Japan Co. Ltd., ING Groep N.V., ING Bank N.V., ING Capital Markets LLC, BNP Paribas, S.A., BNP Paribas North America, Inc., BNP Paribas Securities Corp., BNP Paribas Prime Brokerage, Inc., Oversea-Chinese Banking Corporation Limited, Barclays PLC, Barclays Bank PLC, Barclays Capital Inc., Deutsche Bank AG, Crédit Agricole Corporate and Investment Bank, Crédit Agricole S.A., Credit Suisse Group AG, Credit Suisse AG, Credit Suisse International, Standard Chartered Bank, Standard Chartered PLC, DBS Bank Ltd., DBS Group Holdings Ltd, DBS Vickers Securities (USA) Inc., United Overseas Bank Limited, UOB Global Capital, LLC, Australia and New Zealand Banking Group, Ltd., ANZ Securities, Inc., The Bank of Tokyo-Mitsubishi UFJ, Ltd., The Hongkong and Shanghai Banking Corporation Limited, HSBC Bank USA, N.A., HSBC Holdings plc, HSBC North America Holdings Inc., HSBC USA Inc., Macquarie Bank Ltd., Macquarie Group Ltd., and Commerzbank AG, in the above-referenced matter, request oral argument and will move this Court, before the Honorable Alvin K. Hellerstein, United States District Judge for the Southern District of New York, 500 Pearl Street, New York, New York, at a date and time to be determined by this Court, for an order pursuant to Rules 12(b)(1), 12(b)(2), 12(b)(3), and 12(b)(6) of the Federal Rules of Civil Procedure dismissing with prejudice, in whole or in part, the claims asserted in the Corrected Second Amended Class Action Complaint.

The grounds for these motions are that the Corrected Second Amended Complaint should be dismissed for lack of personal jurisdiction as to certain Defendants,¹ for lack of venue as to certain Defendants,² for lack of subject matter jurisdiction, and for failure to state a claim upon which relief can be granted as to all Defendants. The specific grounds for Defendants' motions to dismiss are set forth in the following accompanying papers: (1) the Joint Memorandum of Law in Support of Defendants' Motion to Dismiss the Corrected Second Amended Class Action Complaint for Lack of Subject Matter Jurisdiction and Failure to State a Claim, the accompanying Declaration of Matthew J. Porpora, dated October 18, 2017, and exhibits thereto, and the accompanying Declaration of Joel Kurtzberg Regarding Foreign Law, and exhibits thereto; and (2) the Joint Memorandum of Law in Support of Foreign Defendants' Motion to Dismiss All Claims for Lack of Personal Jurisdiction and Venue, and exhibits thereto, and the accompanying Declaration of Joel Kurtzberg in Support of Foreign Defendants' Motion to Dismiss All Claims for Lack of Personal Jurisdiction and Venue, dated October 18, 2017, and exhibits thereto.

¹ Those Defendants are: The Royal Bank of Scotland plc; The Royal Bank of Scotland Group plc; RBS Securities Japan Limited; UBS AG, UBS Securities Japan Co. Ltd.; ING Groep N.V.; ING Bank N.V.; BNP Paribas, S.A.; Oversea-Chinese Banking Corporation Ltd.; Barclays PLC; Barclays Bank PLC; Deutsche Bank AG; Crédit Agricole Corporate and Investment Bank; Crédit Agricole S.A.; Credit Suisse Group AG; Credit Suisse AG; Credit Suisse International; Standard Chartered Bank; Standard Chartered PLC; DBS Bank Ltd.; DBS Group Holdings Ltd; United Overseas Bank Limited; Australia and New Zealand Banking Group, Ltd.; The Bank of Tokyo-Mitsubishi UFJ, Ltd.; The Hongkong and Shanghai Banking Corporation Limited; HSBC Holdings plc; Macquarie Bank Ltd.; Macquarie Group Ltd.; and Commerzbank AG.

² Those Defendants are: Barclays PLC; Crédit Agricole S.A.; Credit Suisse Group AG; Credit Suisse International; DBS Group Holdings; The Hongkong and Shanghai Banking Corporation Limited; HSBC Holdings plc; ING Groep N.V.; ING Bank, N.V.; The Royal Bank of Scotland plc; The Royal Bank of Scotland Group plc; RBS Securities Japan Limited; Standard Chartered PLC; UBS Securities Japan Co. Ltd.; and Macquarie Group Ltd.

Dated: October 18, 2017
New York, New York

Respectfully submitted,

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Declaration of Stela C. Tipi for Deutsche Bank AG, dated
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- Declaration of Joel Kurtzberg Regarding Foreign Law, dated Oct. 18, 2017

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Affidavit of John Michael Harris, dated Oct. 17, 2017 BB

Cayman Online Registry Information Service Inquiry
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Cayman Online Registry Information Service Inquiry
Regarding FrontPoint Asian Event Driven Fund, L.P..... BB2

*Sonterra Capital Master Fund, Ltd. Notice of Winding Up
and Dissolution*, Cayman Islands Gazette (Aug. 9, 2012) BB3

*FrontPoint Asian Event Driven Fund, L.P. Notice of
Winding Up and Dissolution*, Cayman Islands Gazette
(Sept. 27, 2011) BB4

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Cayman Islands Exempted Limited Partnership Law (2014
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- Joint Memorandum of Law in Support of Defendants’ Motion to Dismiss the Corrected
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- Declaration of Matthew J. Porpora, dated Oct. 18, 2017

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Foreign Exchange Market Committee (June 14, 2013)..... CC

2006 ISDA Definitions, International Swaps and
Derivatives Association, Inc..... DD

Singapore Censures 20 Banks Over Rates, Wall Street
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| <i>Primer on Interest Rates</i> , Credit Suisse (Apr. 28, 2010)..... | FF |
| <i>Negative SOR – OCBC Treasury Research’s FAQ</i> , OCBS Bank (Aug. 18, 2011) | GG |
| <i>Bank Probes Find Manipulation in Singapore’s Offshore FX Market – Source</i> , Reuters (Jan. 27, 2013) | HH |
| <i>RBS Managers Condoned LIBOR Manipulation During Expansion</i> , Bloomberg News (Sept. 25, 2012) | II |
| <i>Former RBS Trader Saw Libor Fixing as “Cartel”:</i> Report, Reuters (Sept. 26, 2012) | JJ |
| <i>Commerzbank Sued by Trader Fired Over Rate Probe in Singapore</i> , Bloomberg News (July 7, 2015) | KK |
| <i>UBS Says Singapore Traders Fired for Serious Misconduct</i> , Bloomberg News (Apr. 2, 2013) | LL |
| <i>Macquarie Trader Sacked, ANZ Reclaims Bonuses After Scandal</i> , The Financial Review (June 7, 2013)..... | MM |
| <i>RBS Said to Suspend Trader as Rate-Rigging Spreads Beyond Libor</i> , Bloomberg News (Oct. 4, 2012)..... | NN |